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January 28, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 99-68; *IP-Enabled Services*, WC Docket No. 04-36; *Connect America Fund*, WC Docket No. 10-90; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135

Dear Ms. Dortch:

On January 27, 2011, Jennie Chandra, Eric Einhorn, Cesar Caballero, and I, from Windstream Communications, Inc. (“Windstream”), met in person and by telephone with Zachary Katz, Legal Advisor to Chairman Julius Genachowski; Michael Steffen from the Office of General Counsel; and Sharon Gillett, Carol Matthey, Rebekah Goodheart, Amy Bender, and Elise Kohn from the Wireline Competition Bureau. Consistent with its filings in the above-referenced dockets, Windstream discussed the need for comprehensive, rational reform of the intercarrier compensation system and the universal service high-cost program.

Windstream warned that a significant reduction in intercarrier compensation payments and/or frozen ICLS funding could slow network deployment and could even result in the withdrawal of investment in existing facilities. Given this concern, Windstream – consistent with the January 18, 2011, letter from the CEOs of CenturyLink, Qwest, Frontier, and Windstream to FCC Chairman Julius Genachowski<sup>1</sup> – urged the Commission to act now to confirm that VoIP traffic terminating to the PSTN is subject to the same intercarrier

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<sup>1</sup> Letter from Glen F. Post, III, Chief Executive Officer and President of CenturyLink, Inc., Maggie Wilderotter, Chairman and Chief Executive Officer of Frontier Communications, Ed Mueller, Chairman and Chief Executive Officer of Qwest Communications, and Jeff Gardner, President and Chief Executive Officer of Windstream, to Julius Genachowski, Chairman, Federal Communications Commission, GN Docket No. 09-51, WC Docket Nos. 07-135, 05-337, 04-36, CC Docket Nos. 01-92, 99-68 (January 18, 2011).

compensation rules as other voice providers with whom they compete. Consistent with its reply comments in the *Connect America Fund* proceeding,<sup>2</sup> Windstream also noted that it is essential that the company continue to receive frozen ICLS.

With regard to universal service support, Windstream distributed the attached handout and discussed how the current high-cost funding mechanisms create a “rural-rural divide,” in which a very small number of rural Americans have access to very robust broadband, while many others similarly situated have no access to broadband at all. Windstream reiterated its stance that universal service funding should respond directly to the cost of deploying and sustaining voice and broadband networks in high-cost areas, rather than the size of the companies serving those areas.

Sincerely,

/s/

Malena F. Barzilai

Attachment

cc: Zachary Katz  
Michael Steffen  
Sharon Gillett  
Carol Matthey  
Rebekah Goodheart  
Amy Bender  
Elise Kohn

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<sup>2</sup> Reply Comments of Windstream Communications, Inc., WC Docket Nos. 10-90 and 05-337, GN Docket No. 09-51, at 37-40 (August 11, 2010).